Exemption 6

PHASE 2 SITE INVESTIGATION

C. W. Process Company 5051 Williams Boulevard S.W. Cedar Rapids, Iowa EPA RCRA ID No. IAD005277256

Prepared for:

The

BET Report No. #04486 March 30, 2005

Prepared by:

Blackhawk Environmental Testing, Inc. P.O. Box 85 Denver, Iowa

Telephone: (319) 984-6600 Telefax: (319) 984-6961

2003

March 30, 2005

Blackhawk
Environmental
Testing

Michael W. Rickert Attorneys at Law P.O. Box 193 Reinbeck, IA 50669

Re:

Well Survey/Phase 2 Site Investigation

C. W. Process Company 5051 Williams Boulevard S.W. Cedar Rapids, Jowa

Dear Mr. Rickert:

Introduction

The purpose of this report is to present the field data collected by Blackhawk Environmental Testing, Inc. (BET) for the above referenced project. The work was performed in accordance with BET proposal No. 04486 and your written authorization of November 12, 2004.

Background Information

The above referenced site consists of one vacant, approximately 1,800 square foot house on partial basement with a nearby approximately 4,500 square foot metal manufacturing building with concrete floors and several small attached storage sheds. An approximate 1,000 square foot garage and several other storage buildings are also located on site situated with approximately 23 acres of crop land. Until recently, the site was occupied by the C. W. Process Company, a hammer handle manufacturing facility.

The majority of the metal building space is considered factory and machining areas. Four furnaces are located off the factory area on the northeast side of the building. A small office is located on the northwest side of the building. A hazardous waste staging area is located on the southeast side of the building. Adjacent west is an evaporator unit closure area. A fiberglass storage area is located on the southwest side of the building. A gravel driveway runs from Williams Blvd. past the house, garage and manufacturing building to a shed at the south end of the property containing a waste storage area. The balance of the outside area is covered with grass.

An EPA mandated closure plan was submitted on August 22, 1996 and approved on September 9, 1996. The closure plan and the associated closure plan development report of July 1994 identified several potential closure areas: a hazardous waste staging area, an evaporator dry down area, a hazardous waste storage area and former furnace #2. In addition, the BET phase 1 environmental assessment report of January 7, 2004 identified furnace #1, a former treatment pond, ASTs, hundreds of mostly empty drums and old cars and other scrap yard items as recognized environmental conditions. The original phase 2 report dated July 17, 2004, identified cyanide in groundwater exceeding the MCL.

Site Activity

A BET field technician and crew were mobilized to the site on December 14, 2004. A total of four hand auger soil borings were advanced, one in the suspected former treatment pond and three surrounding the cyanide source. The borings were advanced through clay and sand layers into a dense gray sandy lean clay. All four borings were converted into temporary monitoring wells. Approval was obtained from the neighboring property owner prior to locating the boring on the adjoining east cropland. The monitoring well was removed and the boring plugged with bentonite subsequent to sampling. Boring logs for the four new and three existing monitoring wells are appended.

A BET field technician was mobilized to the site on December 20, 2004. At the property owners request, a tap water sample labeled DWW #2 was collected from the kitchen of the adjoining east residential property. Several gallons of drinking water were flushed to remove stagnant water from the drinking water well and associated piping prior to sample collection. Each of the temporary monitoring wells were developed by removing a minimum of three well volumes from each well. A groundwater sample was subsequently collected from each well and retained for laboratory analysis. The five water samples were submitted for laboratory analysis of cyanide.

A single 55 gallon drum was utilized for decontamination of drill and hand auger sampling equipment. Purged groundwater was subsequently containerized in the same drum. It will remain stored on site near the former treatment pond until necessary testing and disposal activities are completed. A site plan map is appended as figure 1 and a facility drawing is appended as figure 2.

Well Survey

The Iowa Geological Survey Bureau was contacted regarding drinking water wells within 1000 feet of the contaminant source. No wells were identified in their database. The Cedar Rapids water department confirmed the houses adjoining south of the site on 33rd Avenue S.W. are not connected to city water. One residence, at 4531 33rd Avenue S.W., confirmed that all the neighbors on his street were supplied by private drinking water wells. He believes his drinking water well is approximately 150 feet deep.

The county sanitarian, was also contacted. He reviewed his files and reported the private drinking water well at 5001 Williams Blvd. S.W. was tested in 1994; 4471, and 4531 33rd Avenue S.W. wells were tested in 1992; and, the 4551 33rd Avenue S.W. well was tested in 1992 and again in 2001. All the testing indicated good wells and no other information or well logs were available.

Analysis

The one drinking water sample and four groundwater samples were transported to Test America, Inc. for analysis. The drinking water well sample did not report cyanide exceeding method detection limits. The four monitoring wells reported cyanide at concentrations ranging from 0.016 to 22.2 mg/l. The MCL for cyanide is 0.2 mg/l.

Chemical	Date Sampled	TMW4	TMW5	TMW6	TMW7	Standard (mg/i)
Cyanide	12/20/04	20.6	22.2	0.016	0.84	0.2

Discussion

Cyanide concentrations in groundwater exceed the MCL of 0.2 mg/l. The source continues to be located at TMW1 and the cyanide source area has been defined.

Recommendations

Per your direction, a copy of this report has been forwarded to Mr. Ken Herstosky of the EPA.

Standard of Care

The data contained in this report was collected in accordance with currently accepted hydrogeologic and engineering practices at this time and location. Other than this, no warranty is implied or intended.

This report was prepared by:

Ollie R. Thurman, P.E.

Certified Groundwater Professional

Date: March 30, 2005

pc: Ken Herstosky/EPA

File# 04486

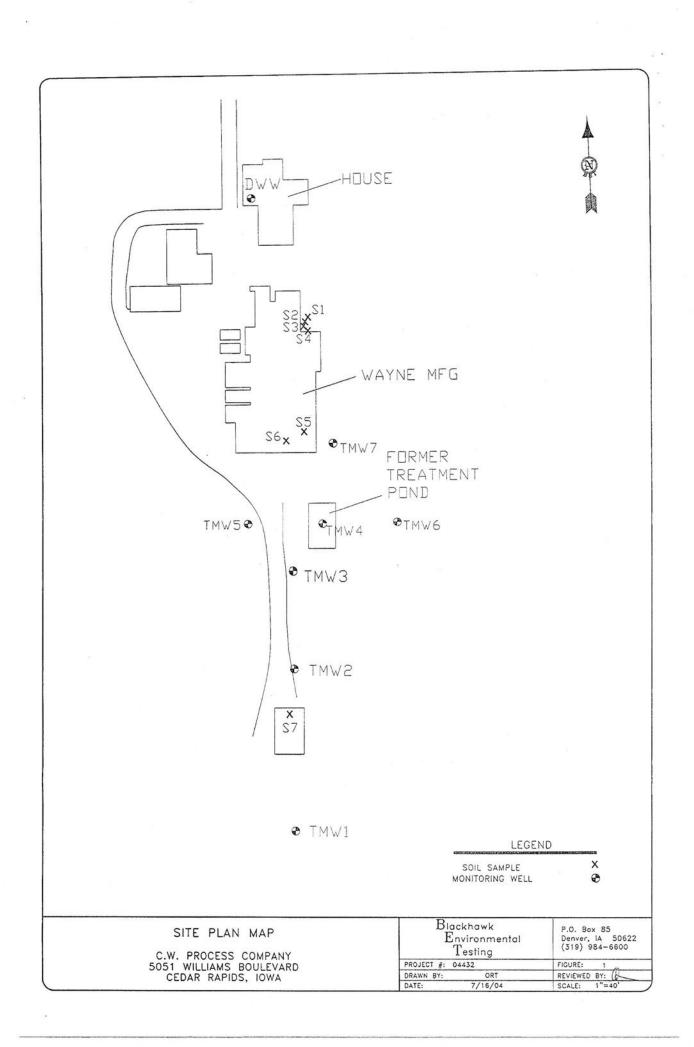
Attachments: Site Plan Map

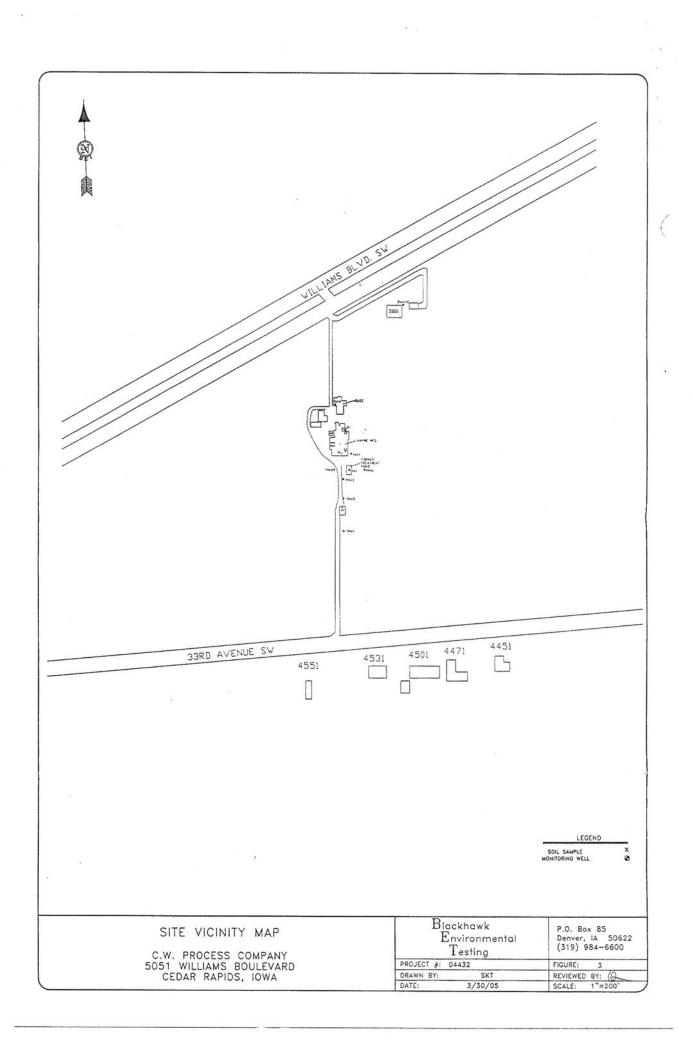
Facility Drawing Site Vicinity Map

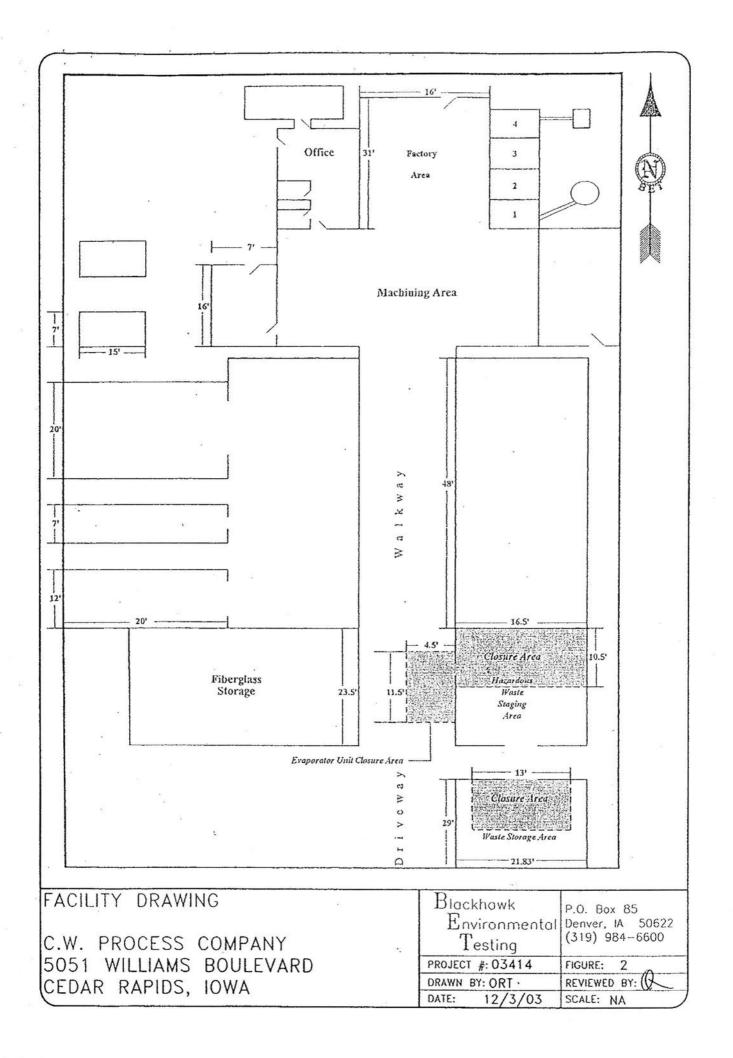
Groundwater Flow Direction Map

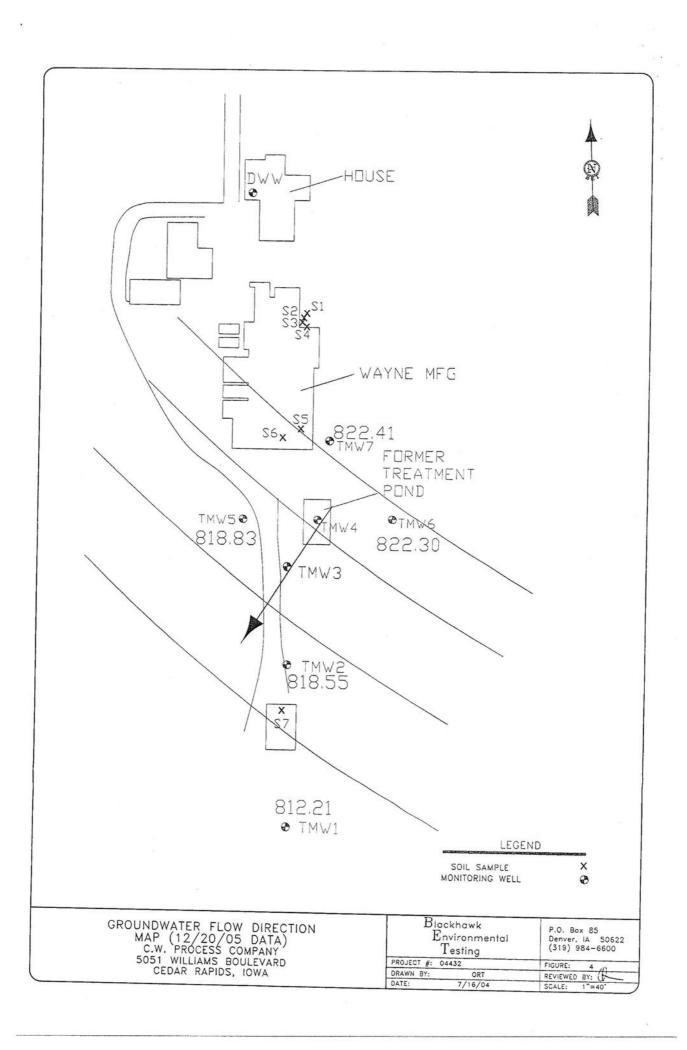
Cyanide Plume Map IGS Well Search Results Analytical Report

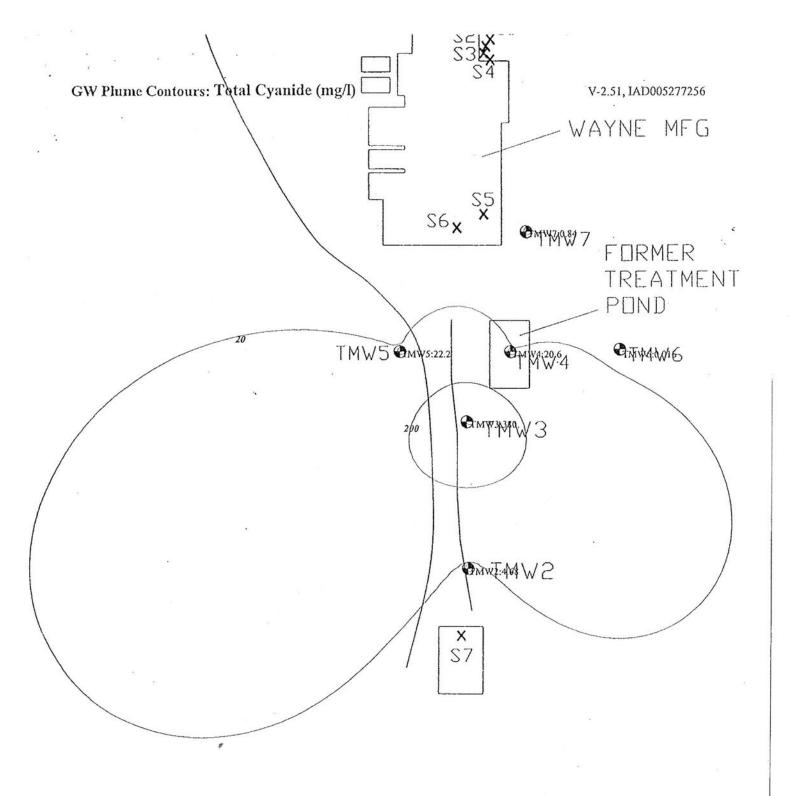
Boring Logs











PMWI:MW1

Iowa Department of Natural Resources 109 Trowbridge Hall Iowa City, IA 52242-1319 319-335-1575 319-335-2754 (fax)



To:

Ollie Thurman

Blackhawk Environmental Testing, Inc.

P.O. Box 85 Denver, IA 50622

319-984-6600/319-984-6961 (fax)

From:

Paul VanDorpe

Date:

3/8/2005

Subject:

Well search results

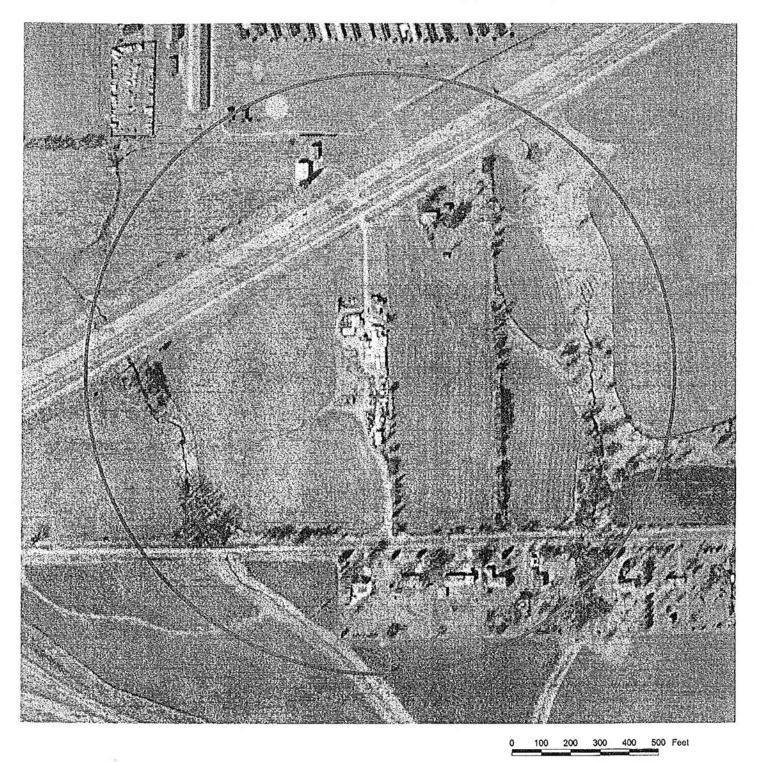
No wells were found that met the criteria of the requested search

Included in search	No. of wells	Database
X	0	IGS well database general well database maintained by IGS, location accuracy varies 3,730 to 25 ft., last updated 12/2004.
Х	0	Public wells (municipal) municipal well database maintained by IGS, location accuracy varies 3,730 to 25 ft., under development
X	0	Public wells (non-municipal) municipal well database maintained by IGS, location accuracy varies 3,730 to 25 ft., under development
Х	0	Private well tracking system IDNR database management system for Grants-to-counties-covered wells. Locational accuracy unknown, assumed to be +/-17m., Last update 12/2004.
Х	0	Wells registered for testing wells tested under Grant-to-Counties program. Locational accuracy varies 1150 to 150 m. Last update 9/2001, no future updates planned.
Х	0	Permitted private wells wells permitted under Grant-to-Counties program. Locational accuracy varies 1150 to 150 m.; Last update 9/2001, no future updates planned.
Х	0	Registered abandoned wells wells abandoned under Grant-to-Counties program. Locational accuracy varies 1150 to 150 m.; Last update 9/2001, no future updates planned.
X	0	Public water supply wells and intakes locational accuracy 220 m., last updated 8/96
Х	0	Water use permit facilities facilities permitted to withdraw >25,000 gallons per day, locational accuracy is +/- 3,750 ft.; last updated 10/96
Х	0	Agricultural drainage wells locational accuracy 100m., last updated 4/98

NOTE:

This "redo" well search would not have been necessary if the site had been adequately located in the first request submitted on 2/21/2005. Inadequate location maps for sites are not the responsibility of the DNR; therefore, this search is considered to be a new well search request.

IGS Well Search Results for client-supplied map location



No wells were located in the search area

ANALYTICAL TESTING CORPORATION 704 ENTERPRISE DRIVE - CEDAR FALLS, IA 50613 - 319-277-2401 - 800-750-2401 - FAX 319-277-2425

ANALYTICAL REPORT

Ollie Thurman BLACKHAWK ENVIRONMENTAL TESTING, INC. PO Box 85 Denver, IA 50622-0085

12/30/2004

TestAmerica Job: 04.17862

Project Number: 04486

Project: Wayne Mfg-Cedar Rapids

Enclosed is the Analytical Reports for the following samples submitted to the Cedar Falls Division of TestAmerica Analytical Testing Corporation for analysis.

Sample		Date	Date
Number	Sample Description	Taken	Received
843244	Kitchen Tap DDW #2	12/20/2004	12/20/2004
843245	TMW #7	12/20/2004	12/20/2004
843246	TMW #6	12/20/2004	12/20/2004
843247	TMW #5	12/20/2004	12/20/2004
843248	TMW #4	12/20/2004	12/20/2004

TestAmerica Analytical Testing Corporation certifies that the analytical results contained herein apply only to the specific samples analyzed.

Reproduction of this analytical report is permitted only in its entirety.

Kristin Clay

Inorganics Operations Manager



704 ENTERPRISE DRIVE · CEDAR FALLS, IA 50613 · 319-277-2401 · 800-750-2401 · FAX 319-277-2425

ANALYTICAL REPORT

Ollie Thurman BLACKHAWK ENVIRONMENTAL TESTING, INC. PO Box 85 Denver, IA 50622-0085

12/30/2004

WAYNE MANUFACTURING-CEDAR RAPIDS, IA 04486

Date Received: 12/20/2004 Job Number: 04.17862

		Result	<u>Units</u>	Flags	Date <u>Taken</u>	Date Analyzed	Time Analyzed	<u>Analyst</u>	Analysis <u>Method</u>
843244 Cyanide	Kitchen Tap DDW #2	<0.010	mg/L		12/20/2004	12/23/2004	12:24	tlz	EPA 335.4
843245 Cyanide	TMW #7	0.084	mg/L		12/20/2004	12/30/2004	14:40	tlz	EPA 335.4
843246 Cyanide	TMW #6 , Total	0.016	mg/L		12/20/2004	12/30/2004	14:41	tlz	EPA 335.4
843247 Cyanide	TMW #5, Total	22.2	mg/L		12/20/2004	12/23/2004	12:26	tlz	EPA 335.4
843248 Cyanide	TMW #4 , Total	20.6	mg/L		12/20/2004	12/23/2004	12:27	tlz	EPA 335.4

Key to Flags:



TestAmerica Job Number: 04.17862

ATTACHMENTS

Following are the sample receipt log and the chain of custody applicable to this analytical report.

Any abnormalities or departures from sample acceptance policy shall be documented on the "Sample Receipt and Temperature Log Form" and Sample Non-Conformance Form" (if applicable) included with this report.

For information concerning certifications of this facility or another TestAmerica facility please visit our website at www.TestAmericaInc.com.

This data has been produced in compliance with 2002 NELAC Standards (July 2004), except where noted.

Samples collected by TestAmerica Field Services personnel are noted on the Chain of Custody (COC) and are sampled in accordance with TA-CF SOP CF09-01.

This report shall not be reproduced, except in full, without written approval of the laboratory.

For questions regarding this report, please contact the individual who signed the analytical report.

Test/America

704 ENTERPRISE DRIVE • CEDAR FALLS, IA 50613 • 800-750-2401 • 319-277-2425 FAX

ANALYTICAL TESTING CORPORATION

Sample Receipt and Temperature Log Form

Client: Black haw	K Envier Pr	roject:
City: Receiv	er's Initials <u>Ce</u>	Time (Delivered): 4' 55
Temperature Record	Thermometer:	Courier:
Cooler ID# (If Applicable) Cooler ID# (If Applicable) C / On Ice	IR - 905085 "A" IR - 809065 "B" CF07-03-T2 22126775	Airborne Speedy UPS TA Courier V elocity TA Field Sys FedEx Client DHL
Temp Blank Temperature out of complian	nce	US Postal Other Exceptions Noted
Custody seals present? Yes Custody seals intact? Yes No Non-Conformance repe	ort started	Sample(s) not received in a cooler. Samples(s) received same day of sampling. Evidence of a chilling process Temperature not taken:

Log-In by:
LS MF EM
OT_____

Test/America

Test America, Inc. - Cedar Falls Division 704 Enterprise Drive Cedar Falls, IA Phone: 319-277-2401 or 1-800-750-2401

Fax: 319-277-2425

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SOIL BORING LOG AND MONITORING WELL CONSTRUCTION DIAGRAM Boring / Well Number: Facility Wayne's Mfg. Co. Facility: 5051 Williams Blvd. SW TMW1 Name: #04432 Street Address: Cedar Rapids, IA Boring Depth (ft) X Diameter (in): 18' x 7" Drilling Method: 3 1/4" HSA Well Contractor Name: Ollie Thurman Logged by: Ollie Thurman Registration Number: 40746 Ground Surface Top of Casing Elevation (ASL): 821.50 Elevation (ASL): 823.12 Date: 5/19/04 Date: 5/19/04 UST **EPA RCRAID** Start Time: 9:20 End Time: 10:30 Number Number: IAD005277256 Depth Well Construction Details **Blow Count** Sample PID / FID Rock Formations, Soil, Color and Classifications, Observations (Feet) if applicable No. Type* Reading (moisture, odor, etc.) First column for USCS SS 0.0 Topsoil, ORGANIC CLAY, 1.5 dark brown (CL) -2 SANDY LEAN CLAY with 3 SS 0.0 a little gravel, brown BENTONITE --4 mottled with gray (CL) 5 SS 0.0 --6 #1 SAND FILTER PACK SILTY SAND, brown, moist (SM) 7 SS 0.0 SANDY LEAN CLAY with --8 a little gravel, dense, 9 SS 0.0 brown with reddish brown (CL) --10 2" DIAM., 0.010" SLOTTED PVC 4 SS 0.0 11 WELL SCREEN --12 SILTY SAND, brown, wet 13 SS 0.0 (SM) --14 SANDY LEAN CLAY, with a little gravel, gray, dense 15 SS 0.0 (CL) --16 16.5 SS 0.0 --18 18 SS 0.0 End of boring @ 18'

* SS (split spoon) HS (hollow stem auger)

--20

Observations	Date:	5/19/04	6/7/04	12/20/04	
Water Levels (ASL)	Level:	808.64	818.60	812.21	
Static Water Level Symbol V	Time:	11:00	14:26	12:30	

SOIL BORING LOG AND MONITORING WELL CONSTRUCTION DIAGRAM Facility Wayne's Mfg. Co. Facility: 5051 Williams Blvd. SW Boring / Well Number: TMW2 Name: #04432 Street Address: Cedar Rapids, IA Drilling Method: 3 1/4" HSA Boring Depth (ft) X Diameter (in): 18' x 7" Well Contractor Name: Ollie Thurman Logged by: Ollie Thurman 40746 Registration Number: Top of Casing **Ground Surface** Elevation (ASL): 823.07 Elevation (ASL): 822.65 **EPA RCRAID** Date: 5/19/04 Date: 5/19/04 UST Start Time: 10:55 End Time: 12:00 Number Number: IAD005277256 Blow Count PID / FID Rock Formations, Soil, Color and Depth Well Construction Details Sample Classifications, Observations (Feet) if applicable Reading No. Type* (moisture, odor, etc.) First column for USCS FILL, 6" of gravel over clay, 1.5 SS 0.0 MANHOLE brown --2 SANDY LEAN CLAY with 3 SS 0.0 a little gravel, brown BENTONITE mottled with gray (CL) --4 5 SS 0.0 SILTY SAND, brown, wet --6 #1 SAND (SM) FILTER PACK 7 SS 0.0 --8 SANDY LEAN CLAY with 0.0 9 SS a little gravel, brown --10 2" DIAM., 0.010" mottled gray, to gray, dense (CL) SLOTTED PVC 0.0 4 11 SS WELL SCREEN --12 13 SS 0.0 --14 SS 0.0 15 16.5 SS 0.0 --16 0.0 --18 18 SS End of boring @ 18' --20

Observations	Date:	5/19/04	6/7/04	12/20/04	
Water Levels (ASL)	Level:	818.89	821.70	818.55	
Static Water Level Symbol V	Time:	14:25	15:00	12:15	

SOIL BORING LOG AND MONITORING WELL CONSTRUCTION DIAGRAM Facility Wayne's Mfg. Co. Facility: 5051 Williams Blvd. SW Boring / Well Number: TMW3 Name: #04432 Street Address: Cedar Rapids, IA Boring Depth (ft) X Diameter (in): 20' x 7" Drilling Method: 3 1/4" HSA Logged by: Ollie Thurman Well Contractor Name: Ollie Thurman Registration Number: 40746 **Ground Surface** Top of Casing Elevation (ASL): 823.59 Elevation (ASL): 823.98 Date: 5/19/04 UST **EPA RCRAID** Date: 5/19/04 Start Time: 12:45 End Time: 13:50 Number Number: IAD005277256 PID / FID Rock Formations, Soil, Color and Blow Count Sample Depth Well Construction Details Classifications, Observations (Feet) if applicable Reading No. Type* (moisture, odor, etc.) First column for USCS SS 1.4 FILL, 6" of gravel over clay, 1.5 MANHOLE dark brown --2 SANDY LEAN CLAY, 3 SS 1.7 discolored green (CL) BENTONITE --4 SS 5 0.8 --6 SANDY LEAN CLAY, brown, #1 SAND discolored gray and reddish FILTER PACK 7 SS 1.1 brown (CL) --8 9 SS 2.3 SAND light brown, medium grained (SP) -102" DIAM., 0.010" SLOTTED PVC 4 11 SS 1.0 WELL SCREEN SANDY LEAN CLAY with a -12little gravel, brown mottled with gray to gray, dense (CL) 13 SS 0.0 --14 15 SS 0.0 --16 17 SS 0.0 --18 18.5 SS 0.0 20 -20SS 0.0 End of boring @ 20'

Observations	Date:	5/19/04	6/7/04	
Water Levels (ASL)	Level:	dry	822.58	
Static Water Level Symbol V	Time:	14:30	15:30	

SOIL BORING LOG AND MONITORING WELL CONSTRUCTION DIAGRAM Facility: 5051 Williams Blvd. SW Facility Wayne's Mfg. Co. Boring / Well Number: Street Address: Cedar Rapids, IA TMW4 Name: #04432 Drilling Method: 3" HA Boring Depth (ft) X Diameter (in): 5.5' x 3" Well Contractor Name: Ollie Thurman Logged by: Ollie Thurman Registration Number: 5475 Top of Casing Ground Surface Elevation (ASL): 826.81 Elevation (ASL): 824.95 EPA RCRA ID Date: 12/14/04 UST Date: 12/14/04 Number: IAD005277256 End Time: 14:30 Number Start Time: 13:30 **Blow Count** Sample PID / FID Rock Formations, Soil, Color and Depth Well Construction Details Classifications, Observations Reading if applicable (Feet) No. Type* (moisture, odor, etc.) First column for USCS Fill, 8" gravel over clay, dark brown. --1 BENTONITE --2 wet at 2.5' --3 #1 SAND FILTER PACK --4 SANDY LEAN CLAY, 2" DIAM., 0.010" brown (CL) SLOTTED PVC --5 WELL SCREEN End of boring at 5.5' --6 --7 --8 --9 --10

Observations	Date:	12/15/04	12/20/05	
Water Levels (ASL)	Level:	823.25	823.48	
Static Water Level Symbol V	Time:	11:24	11:05	

SOIL BORING LOG AND MONITORING WELL CONSTRUCTION DIAGRAM Facility Wayne's Mfg. Co. Facility: 5051 Williams Blvd. SW Boring / Well Number: TMW5 Name: #04432 Street Address: Cedar Rapids, IA Boring Depth (ft) X Diameter (in): 7' x 3" Drilling Method: 3" HA Well Contractor Name: Ollie Thurman Logged by: Ollie Thurman Registration Number: 5475 Ground Surface Top of Casing Elevation (ASL): 822.56 Elevation (ASL): 824.61 EPA RCRA ID Date: 12/14/04 UST Date: 12/14/04 Number: IAD005277256 Start Time: 14:30 End Time: 15:20 Number PID / FID Rock Formations, Soil, Color and Well Construction Details **Blow Count** Sample Depth Classifications, Observations (moisture, odor, etc.) First column for USCS (Feet) if applicable Type* Reading No. TOPSOIL, organic clay, dark brown (QL) --1 SANDY LEAN CLAY with BENTONITE --2 a little gravel, brown to dark brown (CL) --3 #1 SAND FILTER PACK --4 SANDY LEAN CLAY, light 2" DIAM., 0.010" brown (CL) SLOTTED PVC --5 WELL SCREEN wet at 5' --6 LEAN CLAY, brown mottled with gray. (CL) --7 End of boring at 7' --8 --9 --10

Observations	Date:	12/15/04	12/20/04	
Water Levels (ASL)	Level:	818.67	818.83	
Static Water Level Symbol V	Time:	11:26	11:00	

SOIL BORING LOG AND MONITORING WELL CONSTRUCTION DIAGRAM Facility: 5051 Williams Blvd. SW Boring / Well Number: Facility Wayne's Mfg. Co. TMW6 Name: #04432 Street Address: Cedar Rapids, IA Boring Depth (ft) X Diameter (in): 8' x 3" Drilling Method: 3" HA Well Contractor Name: Ollie Thurman Logged by: Ollie Thurman Registration Number: 5475 **Ground Surface** Top of Casing Elevation (ASL): 826.54 Elevation (ASL): 829.34 UST **EPA RCRA ID** Date: 12/15/04 Date: 12/15/04 Start Time: 11:10 End Time: 12:05 Number: IAD005277256 Number Well Construction Details PID / FID Rock Formations, Soil, Color and Depth **Blow Count** Sample Classifications, Observations (moisture, odor, etc.) First column for USCS (Feet) if applicable No. Type* Reading TOPSOIL, organic clay, dark brown (OL) --1 BENTONITE --2 SANDY LEAN CLAY with a little gravel, brown. (CL) --3 #1 SAND FILTER PACK --4 LEAN CLAY medium 2" DIAM., 0.010" dense to dense, reddish SLOTTED PVC brown mottled with gray. --5 WELL SCREEN (CL) --6 SANDY SILT brown, wet at 6' (SM) --7 End of boring at 8' --8 --9 --10

Observations	Date:	12/15/04	12/20/04	
Water Levels (ASL)	Level:	821.90	822.30	
Static Water Level Symbol V	Time:	12:55	11:10	

SOIL BORING LOG AND MONITORING WELL CONSTRUCTION DIAGRAM Boring / Well Number: Facility Wayne's Mfg. Co. Facility: 5051 Williams Blvd. SW TMW7 Name: #04432 Street Address: Cedar Rapids, IA Boring Depth (ft) X Diameter (in): 8.5' x 3" Drilling Method: 3" HA Well Contractor Name: Ollie Thurman Logged by: Ollie Thurman Registration Number: 5475 **Ground Surface** Top of Casing Elevation (ASL): 826.07 Elevation (ASL): 828.36 Date: 12/15/04 Date: 12/15/04 UST **EPA RCRA ID** Start Time: 12:10 End Time: 13:10 Number Number: IAD005277256 Depth **Blow Count** PID / FID Rock Formations, Soil, Color and Well Construction Details Sample Classifications, Observations (Feet) if applicable No. Type* Reading (moisture, odor, etc.) First column for USCS TOPSOIL, organic clay, dark brown (OL) --1 SANDY LEAN CLAY, brown. (CL) BENTONITE --2 --3 #1 SAND --4 LEAN CLAY, reddish FILTER PACK brown mottled with gray, wet at 5.5' (CL) --5 SANDY LEAN CLAY with --6 2" DIAM., 0.010" a little gravel, brown, wet (CL) SLOTTED PVC --7 WELL SCREEN SAND coarse grained, brown (SP) SANDY LEAN CLAY --8 dense, gray (CL) End of boring at 8.5' --9 --10

* SS (split spoon) HS (hollow stem auger)

Observations	Date:	12/15/05	12/20/05	
Water Levels (ASL)	Level:	dry	822.41	
Static Water Level Symbol V	Time:	13:20	10:55	-

DNR FORM 542-1392

TRANSMITTAL

Blackhawk Environmental Testing, Inc.

DATE:

March 31, 2005

TO:

Mr. Ken Herstosky

EPA Region VII

FROM:

Ollie R. Thurman

RE:

Phase 2 Report

Wayne Mfg

EPA RCRA ID No. IAD005277256

PURPOSE:

As You Requested

X_

For Your Information

For your Approval

X

Review and Reply

.....

Other (See Remarks)

REMARKS:

Ken,

Please call me after you get a chance to review the subject report. Specifically, I'd like to know if the site will remain a "NFRAP" designation. If remediation will be required in the future, what site specific target level will likely be assigned? The property is up for sale and the client would like a proposal to achieve EPA closure.

Ollie



RECE"

APR 0 4 2005

ARTD. RCAL

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